

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
AIKEN DIVISION

UNITED STATES OF AMERICA) CRIMINAL NO. 1:24-98
) 18 U.S.C. § 641
) 18 U.S.C. § 981(a)(1)(C)
v.) 28 U.S.C. § 2461(c)
)
EFFIE MAE YOUNMANS) INDICTMENT

COUNT 1

THE UNITED STATES ATTORNEY CHARGES:

From in or around April of 2019, through September of 2020, in the District of South Carolina, Defendant **EFFIE MAE YOUNMANS**, did knowingly and willfully embezzle, steal, purloin, and convert to her own use and the use of another, more than \$1,000 of money and a thing of value of the United States and the U.S. Department of Energy, a department and agency of the United States, that is, U.S. Department of Energy benefits, with the intent to deprive the United States and the U.S. Department of Energy of the use and benefit of the money and thing of value;

In violation of Title 18, United States Code, Section 641.

FORFEITURE

A. THEFT OF GOVERNMENT PROPERTY:

Upon conviction for violations of Title 18, United States Code, Section 641 as charged in this Indictment, the Defendant, **EFFIE MAE YOUNMANS**, shall forfeit to the United States any property, real or personal, constituting, derived from or traceable to proceeds the Defendant obtained directly or indirectly as a result of such offenses.

B. PROPERTY:

The property subject to forfeiture includes, but is not limited to, the following:

CASH PROCEEDS/FORFEITURE JUDGMENT:

A sum of money equal to all proceeds the Defendant obtained directly or indirectly from the offenses charged in the Indictment, that is, a minimum of approximately \$54,450.00 in United States currency, and all interest and proceeds traceable thereto.

C. SUBSTITUTE ASSETS:

If any of the property described above as being subject to forfeiture, as a result of any act or omission of the Defendant –

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third person;
- (c) has been placed beyond the jurisdiction of the Court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 18, United States Code, Sections 982(b)(1), [incorporating Title 21, United States Code, Section 853(p)], to seek forfeiture of any other property of the said Defendant up to the value of the above forfeitable

property.

Pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c).

A True BILL

[REDACTED]
FOREPERSON

ADAIR F. BOROUGH
UNITED STATES ATTORNEY

BY: 

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